

ACCET DISPUTES THE ALLEGATIONS IN THE FOLLOWING MEMORANDUM:

December 30, 2016

To:

Mr. William V. Larkin, Ed.D. - ACCET Executive Director
Ms. Judy Hendrickson - ACCET Deputy Executive Director
Mr. Herman Bounds, Chief, Accreditation Division, US ED
Ms. Katherine H. Westerlund, Certification Chief, SEVP
Ms. Rachel Canty, Director of External Operations, SEVP

Re: English USA Language School – ACCET Denial of Accreditation – Final Decision

We are in receipt of the ACCET letter dated December 13, 2016 with its Final Decision to Deny Initial Accreditation and the November 17, 2016 letter from the ACCET Appeals Panel Affirming the Decision to Deny Accreditation.

Per your offer to allow us to offer our “narrative” please accept the following:

The basis of our appeal was:

1. Failure of the Site inspection team to follow ACCET's ethical standards.
2. Failure of the Site inspection team to competently conduct the inspection.
3. Failure of the Site inspection team to honestly report their findings.
4. Intentional misrepresentation of the Site inspection team.
5. Falsifying the Site Inspection Report.
6. Improper, negligent and unethical conduct of the Site Team.

In addition, at the appeals hearing, we provided ACCET and the panel with six signed and notarized affidavits representing that the above basis of our appeal was factual and two of these affidavits even alleged sexual harassment and even possible religious discrimination by the site inspection team.

ACCET says “their internal investigation showed no merit to any of these claims”. However, not a single external person was contacted that we know of, not even the alleged victims of the sexual harassment.

We had requested a “defer” decision from the appeals panel and asked for a new inspection team. It was our hope that a new, unbiased, ethical and honest site inspection team would be able to provide a “true report”.

Based on the letter from the appeals panel, they seemed to be under the impression that we had not informed ACCET of our complaints per ACCET policy. In our opinion, the fact that ACCET's legal counsel was notified and ACCET's Deputy Executive Director was notified of these complaints and the alleged sexual harassment, we did in fact comply with ACCET policy and procedure.

The fact that ACCET did not talk to the alleged victims or any of the other individuals that provided sworn affidavits is perplexing, to say the least. I cannot imagine any school in the U.S. failing to investigate written allegations of sexual harassment.

During the appeals hearing we had expressed that many of the "citations" by the site team did not apply to ACCET standards and that many items they stated "the school failed to provide" them, were in fact, never requested by the site team.

Based on the dates of the letters received from the Appeals Panel and ACCET, it appears that the panel affirmed the denial of initial accreditation without giving any consideration to our basis of appeal.

It is our contention that the appeals panel and the appeals process did NOT follow ACCET's policies and procedures for an independent hearing and this failure to follow its own procedures and policies was detrimental to the outcome of the hearing.

It is also our contention that there has been a terrible miscarriage of justice and a corruption of the administrative process in the handling of our site inspection, and the appeals hearing. Sadly, it feels like the "wagons have circled" to protect ACCET and its reputation from any harm or liability, regardless of ethics, the truth, and the victims of the alleged sexual harassment.

It is conceivable that the three individuals that performed that site visit, none of whom we assume are ACCET employees and or executives, may have made some errors and may have appeared to have acted improperly. With all of the hundreds if not thousands of site visits conducted by ACCET, there must have been times where these teams made mistakes or had an error in judgement. It is our assertion that our visit was one of these times.

With our SEVIS Certification and the survival of our school at stake, we will avail ourselves of an independent judicial process to resolve the basis of our appeal with the same desired outcome of receiving an honest, ethical and professional site inspection team report that the ACCET Commission can review and act on.

Respectfully,

A handwritten signature in black ink, appearing to read 'Richard Levin', written in a cursive style.

Richard Levin
English USA Language School
Campus Director / PDSO